

## REMARKS

Claims 1-21, 24-44, 46-49 and 53-55 are now pending in this application. Reconsideration of the application is earnestly requested.

The Office action has rejected claims 1-14, 16-21, 32, 34-37, 42-44, 47-49 and 53-55 under §103 as being unpatentable over *Chim et al.* (*Chim*) in view of *Alexander et al.* (*Alexander*). Although the Examiner's arguments have been carefully considered, Applicant respectfully traverses this rejection.

Dependent claims 56-61 have been incorporated into their respective independent claims. The fourth step of claim 21 was placed in bold in the Reply filed March 3, 2008 but was inadvertently not underlined. That step has been underlined in this reply to indicate that it should have been added in the previous reply.

### The Present Invention

Having a camera that does not need to physically move in order to refocus on a particular object in the field of view is advantageous for a user with a camera that physically cannot move or for a camera that does not have sophisticated panning or tilting capability. Refocusing on an image or on sound is provided.

### The Cited Art Distinguished

Reply A filed June 8, 2007 pointed out in detail why *Alexander* requires that its video camera must physically move before any zooming or focusing is performed. Reply B filed November 26, 2007 pointed out in detail why *Chim* also requires that its video camera physically move. For brevity, those arguments will not be repeated here.

Claim 1 (for example) specifically requires that the media content pickup device automatically focuses on the user-specified region of interest (using the autofocus mechanism) "without moving the media content pickup device." The other independent claims (12, 21, 32, 44 and 49) also similarly require that the camera, microphone or media content capturing device does not move. In other words, automatic focusing on a user-specified region occurs without requiring the camera to move. By contrast, the cited references both require that their cameras move before any focusing occurs.

Page 4 of the Office action again cites *Chim* for the proposition that the media content pickup device automatically focuses without moving the device, and again refers to "scaling and cropping" as being the equivalent of automatic focusing. Applicant has explained in great detail in Reply B and in Reply C why scaling and cropping are not the same as automatic focusing and why *Chim* requires that its camera moves.

As page 5 the Office action relies upon *Alexander* as teaching an autofocus mechanism. (Applicant stresses that claim 1 does not require simply an autofocus mechanism, but requires an autofocus mechanism that automatically focuses without moving the media content pickup device.) Paragraph 7 discusses prior art videoconferencing systems having an autofocus camera, but this refers to focusing that occurs once the camera has been moved. I.e., once the subject has been centered by moving the camera then focusing occurs ("In addition, many of the prior art cameras also require the user to manually focus and/or zoom the camera when the object of interest was ultimately framed"). Claim 1 (and the other independent claims) require automatic focusing without moving the camera.

The Office action also cites paragraph 21 of *Alexander*. The whole point of *Alexander* is to automatically move the remote camera once the user has selected particular coordinates, thus freeing the user from having to move the camera manually. The final sentence of paragraph 21 makes clear that the remote camera is moved ("positioned") once the user has selected an object on the screen. This paragraph also states "automatically adjusting the field of focus and focal length of a remote video camera." Paragraph 25 makes clear that "field of focus" refers to the aim, direction, or field of view of the camera; and that "focal length" refers to zooming a camera. Thus, "field of focus" and "focal length" do not disclose automatic focusing; the concepts are different. Even if *Alexander* can be considered as disclosing an automatic focusing technique, it is in the context of the camera being required to move first.

For these reasons, it is requested that the rejection of claim 1 be withdrawn. Claim 12 requires "said camera arranged to automatically focus on a determined region of the field of view without moving the camera" and "an autofocus mechanism" and is believed patentable for the reasons presented above. Claim 21 requires "sending a focus command to an autofocus mechanism" and "causing the camera to focus on the focus region without moving the camera" and is believed patentable for the reasons presented above. Claim 44 requires "using said

autofocus mechanism so that the second video input is focused on the region of interest without moving said second camera" and is believed patentable for the reasons presented above. Claim 49 also requires processing a media content input without moving the media content capturing device and is also believed patentable.

Claim 32 requires "using digital signal processing to process the audio input to target the audio input towards the region of interest without moving said microphones." Applicant has explained in the previous replies why this feature of claim 32 is not present in the cited references. Furthermore, the Office action at page 15 does not allege that the above feature is present in any of the references. For at least this reason, it is believed that claim 32 is patentable over the cited art.

Reconsideration of this application and issuance of a Notice of Allowance at an early date are respectfully requested. If the Examiner believes a telephone conference would in any way expedite prosecution, please do not hesitate to telephone the undersigned at (612) 252-3330.

Respectfully submitted,  
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